

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

Plaintiff,

v.

CHRISTOPHER COLLINS, et al.

Defendants.

Case No. 18-cr-567 (VSB)

**APPLICATION GRANTED
SO ORDERED**

VERNON S. BRODERICK

U.S.D.J. 10/1/2018

**MOTION ON CONSENT FOR EXTENSION OF TIME
TO SEEK A BILL OF PARTICULARS**

Christopher Collins, Cameron Collins, and Stephen Zarsky (“Defendants”), by and through their undersigned counsel, respectfully submit this motion on consent (the “Motion”) pursuant to Fed. R. Crim. P. 7(f) and 45(b) for an extension of time to seek a bill of particulars.

In support of this Motion, Defendants state as follows:

1. On August 8, 2018, the United States Attorney’s Office for the Southern District of New York filed an indictment against Defendants. The Court held an arraignment the same day, at which time each of the Defendants entered a plea of not guilty.

2. Also at that time, the Court scheduled a status conference for October 11, 2018 to address, among other issues, discovery and a motions schedule.

3. Fed. R. Crim. P. 7(f) allows a defendant to “move for a bill of particulars before or within 14 days after arraignment or at a later time if the court permits.” Although counsel for Defendants believe, based upon the scheduled October 11, 2018 status conference, that the Court does not expect motions for a bill of particulars to be filed within 14 days after the arraignment, in an abundance of caution Defendants move the Court for an extension of time to file motions for a bill of particulars. The United States consents to the relief requested.

4. Defendants submit that seeking a bill of particulars at this juncture, prior to the provision of discovery by the United States and prior to the filing of any other motions by the Defendants, would be premature and inefficient. Accordingly, good cause exists supporting an extension of time to seek a bill of particulars.

5. Counsel for Defendants conferred with counsel for the United States regarding this request for an extension, and counsel for the United States consents to the relief requested herein.

WHEREFORE, Defendants respectfully request that the Court grant this Motion and extend the time for Defendants to seek a bill of particulars under Fed. R. Crim. P. 7(f) to a date to be set by the Court at the October 11, 2018 status conference.

Respectfully submitted this 22nd day of August, 2018.

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